

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., *et al.*, : Case No. 22-10943 (MEW)
Debtors. : Jointly Administered
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**JOINT STIPULATION AND AGREED ORDER AMONG VOYAGER DIGITAL LLC,
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND CELSIUS NETWORK
LLC SETTING DEADLINE TO FILE OBJECTIONS TO MOTION**

This stipulation and agreed order (the “Stipulation and Order”) is entered into by and among Voyager Digital LLC (the “Debtor”), the Official Committee of Unsecured Creditors (the “Committee”), and Celsius Network LLC (“Celsius,” and together with the Debtor and the Committee, the “Parties”) in the above-captioned proceedings. Each of the Parties agrees to and stipulates to the following:

WHEREAS, on December 14, 2022, Celsius filed a motion for entry of an order (i) lifting the automatic stay pursuant to section 362(d)(1) of title 11 of the United States Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure to permit commencement of an adversary proceeding against Debtor to recover preferential transfers and (ii) extending, nunc pro tunc, Celsius’ time to file a proof of claim in this action despite passage of the bar date pursuant to Bankruptcy Rules 3003(c)(3) and 9006(b)(1) (the “Motion to Lift Stay”).

WHEREAS, a hearing on the Motion to Lift Stay will be held before the Honorable Michael Wiles at the next omnibus hearing date scheduled in this case on **January 24, 2023, at 11:00 a.m., prevailing Eastern Standard Time** (the “Hearing”).

WHEREAS, under Paragraph 48 of the Case Management Order [ECF No. 240] (“CMO”), the current objection deadline for the Motion to Lift Stay is Saturday, January 21, 2023 and the current deadline to file a reply to any objections is Sunday, January 22, 2023, leaving Celsius one day or less to prepare and file a reply.

WHEREAS, pursuant to Paragraphs 19 and 29 of the CMO, the Parties agreed to amend the objection deadline as set forth in Paragraph 48 of the CMO in order to allow Celsius adequate time to prepare a reply to any objections.

WHEREAS, the Parties have agreed to the following amended briefing schedule:

	Filing Date	Objection Date	Reply Date	Hearing Date
Current Schedule Under CMO	December 14, 2022	January 21, 2023	January 22, 2023	January 24, 2023
Amended Briefing Schedule	December 14, 2022	January 17, 2023	January 22, 2023	January 24, 2023

WHEREAS, the Parties now jointly submit this Stipulation and Order and respectfully request that the Bankruptcy Court approve the stipulation set forth below pursuant to Paragraphs 19 and 29 of the CMO.

IT IS THEREFORE STIPULATED, AGREED AND ORDERED THAT:

1. The deadline to object to Celsius’ Motion to Lift Stay be changed from January 21, 2023, to January 17, 2023.
2. Any objections to Celsius’ Motion to Stay shall be served so as to be actually received by entities on the Master Service List by January 17, 2023.
3. Celsius’ deadline to file a reply to any objections remains January 22, 2023.
4. The Hearing shall go forward with respect to all relief requested in the Motion not specifically granted pursuant to this Stipulation and Order.

5. This Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Stipulation and Order.

[Remainder of page intentionally left blank]

SO STIPULATED:

Dated: December 21, 2022

/s/ Mitchell P. Hurley

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*Counsel to the Official Committee of
Unsecured Creditors*

SO ORDERED.

Dated: New York, New York
December 22, 2022

/s/ Michael E. Wiles

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE